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Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER
IN SUPPORT OF DEFENDANT UBER
AND OTTOMOTTO'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF THEIR
REPLY IN SUPPORT OF MOTION TO
STRIKE VAGUE AND OVERBROAD
TRADE SECRET CLAIMS (DKT. 1174)**

1 I, Lindsay Cooper, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants Uber and Ottomotto’s Administrative
7 Motion to File Under Seal Portions of Their Reply in Support of Motion to Strike Vague and
8 Overbroad Trade Secret Claims (the “Administrative Motion”). The Administrative Motion seeks an
9 order sealing highlighted portions of Uber and Ottomotto’s Reply in Support of Motion to Strike
10 Vague and Overbroad Trade Secret Claims (“Reply”) and Exhibit A in support of the same.

11 3. The Reply (portions highlighted in green) and Exhibit A (portions highlighted in green
12 filed concurrently herewith) contain or refer to trade secret and confidential business information,
13 which Waymo seeks to seal. The portions of the Reply and Exhibit A that are highlighted in green
14 contain, reference, and/or describe Waymo’s asserted trade secrets. I understand that these trade
15 secrets are maintained as secret by Waymo (Dkt. 25-47) and are valuable as trade secrets to Waymo’s
16 business (Dkt. 25-31). The public disclosure of this information would give Waymo’s competitors
17 access to in-depth descriptions—and analysis—of the functionality of Waymo’s autonomous vehicle
18 system. If such information were made public, I understand that Waymo’s competitive standing would
19 be significantly harmed. Waymo’s request to seal is narrowly tailored to only the confidential
20 information.

21 4. Waymo’s request to seal is narrowly tailored to those portions of the Reply and Exhibit
22 A that merit sealing.

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1 I declare under penalty of perjury under the laws of the State of California and the United
2 States of America that the foregoing is true and correct, and that this declaration was executed in San
3 Francisco, California, on August 18, 2017.

4 By /s/ Lindsay Cooper
5 Lindsay Cooper
6 Attorneys for WAYMO LLC
7

8 **ATTESTATION**

9 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
10 document has been obtained from Lindsay Cooper.
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12 By: /s/ Charles K. Verhoeven
13 Charles K. Verhoeven
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